IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

AVA SLAUGHTER,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. H-05-3455
	§	
JONES DAY,	§	
	§	
Defendant.	§	
	§	

DEFENDANT JONES DAY'S EMERGENCY MOTION FOR EXTENSION OF JOINT PRETRIAL ORDER DEADLINE AND DOCKET CALL

Defendant Jones Day ("Jones Day" or "Defendant") respectfully files the following Emergency Motion for Extension of Joint Pretrial Order Deadline and Docket Call:

This case is currently set for docket call on December 8, 2006. Under the Court's Docket Control Order, the Joint Pretrial Order in this case is due to be filed on December 1, 2006. Currently pending before the Court is Jones Day's Motion for Summary Judgment, the Motion Docket Date for which is November 30, 2006. In light of the pending motion for summary judgment, Defendant respectfully moves this Court to extend the time of filing the Joint Pretrial Order to ***January 12, 2007*** and reset docket call to ***January 19, 2007***.

This is the first request for a continuance from either party. This request is not made for purposes of harassment or delay, but in the interest of judicial efficiency and in an effort to avoid incurring additional and potentially unnecessary costs and fees.

WHERE, PREMISES CONSIDERED, Defendant prays that this Court enter its Order granting an extension of time in which to file the joint pretrial order and appear for docket call.

Dockets.Justia.com

Respectfully submitted,

/s/ Shauna Johnson Clark by permission
Kelley Edwards

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JONES DAY

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CERTIFICATE OF CONFERENCE

Despite the best efforts of the undersigned, counsel for Defendant was unable to confer with Plaintiff's counsel as to whether or not he is opposed to this Motion.

/s/ Kelley Edwards
Kelley Edwards

CERTIFICATE OF SERVICE

This pleading was served in compliance in compliance with Rule 5 of the Federal Rules of Civil Procedure via electronic transmission on this 22nd day of November, 2006, to counsel listed below:

Mr. Thomas Padgett, Jr.
Baker & Patterson, L.L.P.
1004 Prairie, Ste 300
Houston, Texas 77002

/s/ Kelley Edwards
Kelley Edwards